



Procedure: C-A-EMP- LEGACY
Revision: 01
Revision Date: 03/01/04

COLLIDER-ACCELERATOR DEPARTMENT

Title: Environmental Management Program For C-A Legacy Issues

Prepared by: M. Van Essendelft

Group: ESH&Q

Approvals

Signature on File _____ Date: _____

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Signature on File _____ Date: _____

Collider-Accelerator Department Chairman

(Indicate additional signatures)

Y N

☐ x FS Representative: _____ Date: _____

☐ x Radiological Control Coordinator: _____ Date: _____

☐ x Chief ME: _____ Date: _____

☐ x Chief EE: _____ Date: _____

x ☐ Environmental/P2 Coordinator: Signature on File _____ Date: _____

☐ x QA Manager: _____ Date: _____

☐ x Other: _____ Date: _____

ENVIRONMENTAL MANAGEMENT PROGRAM <u>C-A Legacy Issues</u>	Completed by: <u>M. Van Essendelft</u> Date: <u>March 1, 2004</u>
1. Significant Aspects: (see table of "Criteria for Significant Aspects" for description of letter designation) <ul style="list-style-type: none"> • Radioactive, Hazardous, and Mixed Waste (a) • Soil activation (a) 	
2. Objective(s): <p>A. COMPLIANCE - f. Facility Review Disposition Project (FRDP)</p> <p>B. LEGACY RISK MANAGEMENT - Identify and manage legacy items to remediate those items where funding is allocated and to pursue alternate funding sources for those items in a manner that expedites remediation of the area. Corresponds with Laboratory CO 3.4.1</p> <p>C. NUCLEAR and RADIOLOGICAL FACILITIES and OPERATIONS - Reduce the risk and liability of excess nuclear and radiological materials within the C-A Department. Corresponds with Laboratory CO 3.4.2</p>	
3. Target(s): <p>A. Ensure all FRDP issues have been transferred to appropriate programs by May 30, 2004</p> <p>B. Eliminate a minimum of two funded legacy items and request funding for all unfunded items</p> <p>C. Inventory, prioritize, and prepare a plan for the disposition of orphan radiological materials within the C-A complex</p>	
4. Environmental Performance Indicator(s): <ul style="list-style-type: none"> • Tier I inspection results. • Number of items addressed from C-A Legacy Material List. 	
5. Program Description: <p>Departmental self-assessment program, Tier I inspections, and annual compliance reviews by the C-A ESHQ Division ECR shall meet EWMSD Environmental Objectives & Targets FY2004. Tracking and trending waste generation and waste recycling as well as on time regulatory reporting shall contribute towards achieving EWMSD Environmental Objectives & Targets FY2004. Submitting pollution prevention projects, success stories or lessons learned shall contribute towards achieving FY04 Critical Outcome/Objective 3.4.3 Pollution Prevention. The minimization of wastes, prevention of spills and meeting SPDES permit limits shall also help satisfy the overall contract Objective 3.4, Improved ESH&Q.</p> <p>The Facility Review Disposition Project (FRP) and the Site Wide Material Disposition Project have identified historical and/or legacy issues in C-AD. These projects represented a comprehensive examination of all past and present operations that had the potential to impact the environment. The review included an in-depth</p>	

examination of all present and past facilities that were in use during the operation of BNL under the Department of Energy. A list of "Unfunded Environmental Liabilities" was drafted by Laboratory staff and reviewed with the DOE. The Department shall help further identify legacy issues in a comprehensive manner. Many of the issues identified in the draft list pose regulatory (e.g., storage of wastes for periods >1 year), environmental (e.g., contaminated media), and social risks to BNL. The C-A Department shall actively find a path forward to better define the scope and priority of the issues and seek/identify funding resources to implement cleanup. This effort shall contribute towards achieving FY04 Critical Outcome/Objective 3.4.1 Legacy Risk Management.

The environmental management program is instituted to manage operations in accordance with applicable requirements, to evaluate the feasibility of pollution prevention opportunities that eliminate or reduce the future generation of these wastes, and to continually improve operations.

The responsibility for implementing these tasks lies with the C-AD EMS Representative.

6. Potential Environmental Impact(s):

- Waste mismanagement could contaminate the environment and incur RCRA or local regulatory agency penalties.
- Not addressing environmental vulnerabilities could contaminate the environment and incur regulatory penalties.

7. Legal and Other Requirements:

The following BNL SBMS subject areas apply:

- Pollution Prevention and Waste Minimization
- Hazardous Waste Management
- Radioactive Waste Management
- Environmental Monitoring
- Storage and Transfer of Hazardous Materials
- Storage/Use of Chemicals (a)
- PCBs (a)
- Liquid Discharges (b)

8. Operational Controls:

- Work Planning documentation
- C-A OPM's as appropriate

9. Budget: C-A Operating budget, and BNL funding (Legacy Project budget, UIC, and ERD budgets, FRP budget).

10. Structure, Authorities, Responsibilities

Tasks	Person Responsible	Completion Dates
A. Verify transfer of FRDP issues as determined by SME report due by the end of first quarter	C-A ECR	06/04
B. Submit a Field Work Proposal to address the clean-up of legacy materials due to prior High Energy Physics operations. Track the number legacy items disposed of and track the funding requests through to final disposition of the request	C-A Associate Chair for ESHQ C-A Environmental Coordinator	02/04 Ongoing
C. The C-A Environmental Coordinator in conjunction with the Facilities & Experimental Support group shall inspect, maintain and store orphaned materials in an appropriate area until disposition and funding is available for reuse or disposal	C-A Environmental Coordinator and FES Group Leader	08/04